

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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In the Matter of

Application by Bell Atlantic for
Authorization under Section 271 of the
Communications Act to Provide In-region,
InterLATA Service in the State of New York

CC Docket No. 99-295

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**COMMENTS
of the
GENERAL SERVICES ADMINISTRATION**

GEORGE N. BARCLAY
Associate General Counsel
Personal Property Division

MICHAEL J. ETTNER
Senior Assistant General Counsel
Personal Property Division

GENERAL SERVICES ADMINISTRATION
1800 F Street, N.W., Room 4002
Washington, D.C. 20405
(202) 501-1156

Economic Consultants:

Snively King Majoros O'Connor & Lee, Inc.
1220 L Street, N.W., Suite 410
Washington, D.C. 20005

October 19, 1999

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**COMMENTS
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GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA") submits these Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Commission's request for comments on the application by New York Telephone Company d/b/a Bell Atlantic – New York *et al.* ("Bell Atlantic") for authority to provide in-region, interLATA services in the State of New York.

On September 29, 1999, Bell Atlantic filed an application with the Commission for authority to provide in-region, interLATA services pursuant to the Communications Act of 1934, as amended.¹ On the same date, the Commission issued a Public Notice inviting interested parties to submit comments on the application.

The objective of these Comments is not to express opposition to Bell Atlantic's request, nor to express an opinion on the overall merits of the application. The purpose is to bring to the Commission's attention a practical problem that GSA, as a large consumer of local services, is encountering in transitioning services from the

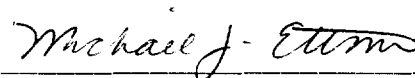
¹ 47 U.S.C., Section 271.

incumbent local exchange carriers ("LECs") to the competitive LECs in competitive procurements. The problem concerns the status of building riser cable and the customer's right to use this cable for the provision of services from the carrier of its choice. In this situation, access to the building's riser cable is critical. This problem has implications for all customers in multi-story buildings throughout the nation.

The Telecommunications Act of 1996 enunciated pro-competitive policies, with requirements for interconnections by all carriers and a "checklist" for measuring incumbent carriers' progress in meeting the Act's open access requirements. Uncertainties that customers face regarding the legitimate use of riser cable may be appropriate for consideration during deliberations that will set the stage for an incumbent LEC providing inter-LATA services.

Respectfully submitted,

GEORGE N. BARCLAY
Associate General Counsel
Personal Property Division



MICHAEL J. ETTNER
Senior Assistant General Counsel
Personal Property Division

GENERAL SERVICES ADMINISTRATION
1800 F Street, N.W., Rm. 4002
Washington, D.C. 20405
(202) 501-1156

October 19, 1999

CERTIFICATE OF SERVICE

I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Comments of the General Services Administration" were served this 19th day of October, 1999, by hand delivery or postage paid to the following parties.

The Honorable William E. Kennard,
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

The Honorable Harold Furchtgott-Roth,
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

The Honorable Susan Ness,
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

The Honorable Gloria Tristani
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C 20554

The Honorable Michael K. Powell
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C 20554

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W. Counter TWA325
Washington, D.C. 20554

International Transcription Service
1231 20th Street, N.W.
Washington, D.C. 20036

Ms. Janice Myles
Policy and Prog. Planning Div.
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Michael J. Ettner